IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

		§	Art Unit:	2195
In re Applicant:		§		
	Hong Jiang et al.	§		
		§	Examiner:	Eric Charles Wai
Serial No.:	10/750,589	§		
		§	Conf. No.:	8821
Filed:	December 31, 2003	§		
		§	Atty Docket:	ITL.1710US
For:	Visual and Graphical Data	§		P18028
	Processing Using a Multi-	§		
	Threaded Architecture	§	Assignee:	Intel Corporation

Mail Stop **Appeal Brief-Patents**
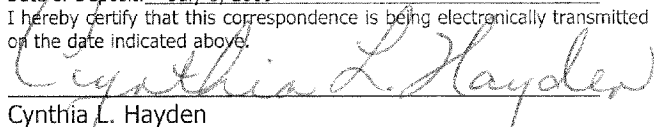Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

In response to the Examiner's Answer, the following Reply Brief is submitted.

1. Wenniger Never Places Process B In An Inactive State

The Examiner points out that the specification in the present application has two requirements for an inactive state. One is cessation of execution and the other is halting polling. The Examiner's argument is inconsistent with his own position since he argues that simply halting polling is sufficient to place something in an inactive state. To the contrary, the applicant's specification, relied on by the Examiner in the Reply, requires both halting execution and halting polling. There is no basis whatsoever to conclude that the reference halts execution and, therefore, the rejection should be reversed.

This is a distinction with a difference since the cited reference only halts polling, but continues to do anything else it chooses since execution is not stopped. Since the resource is not available, this could create conflicts if execution were allowed to continue, even if polling stopped.

2.   The Examiner's Rejection Reads "Granting Control Of The Resource Out Of The Claim"

As pointed out in the Appeal Brief, the Examiner simply reads this limitation out of the claim. Since the Examiner did not address this limitation, it amounts to still another basis for reversing the rejection.

3.   The Reference Allows Polling To Resume Later, But Never Grants The Resource

The Examiner's argument that "selectively" granting the resource somehow means that it is selectively granted after the resource is available is, of course, an untenable reading of the claims. The claims state "to selectively grant control of the semaphore in response to the semaphore request message by transmitting a semaphore acknowledge message to the execution circuitry." Thus, there can be no reasonable doubt what the selectively limitation means in the claims. It means that it is selective in the sense that it is only done in response to a semaphore request message and it is done by transmitting a semaphore acknowledge message. The Examiner's suppositions are completely unsupported, inconsistent with the claim language, and amount to an improper claim construction.

The argument that there is no explicit granting of the resource in the claim is completely inconsistent with the claim language which uses that exact language and is yet another instance of the Examiner attempting to make these limitations disappear from the claims.

As pointed out above, simply allowing re-polling does not cut the mustard here. It amounts to a teaching away from the claimed invention, does not meet the claimed limitations, and, as pointed out previously, would be less effective than what is claimed.

4.   In The Cited References The Thread Is Never Removed From The Inactive State "In Response To A Semaphore Acknowledge Message"

This limitation, argued in the Appeal Brief, is simply ignored in the Examiner's Answer. It amounts to still another basis for reversing the rejection.
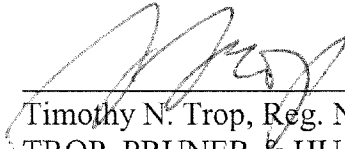
The Examiner's argument that control over the semaphore is granted "eventually" does not meet the claim limitations. The claims call for selectively granting control of the semaphore message "in response to the semaphore request message by transmitting a semaphore acknowledge message to the execution circuitry." Further, it requires the execution circuitry, in response to receiving that semaphore acknowledge message, to remove the thread of instructions from the

inactive state. The Examiner tacitly admits that this is simply not done by arguing that, for some reason, which is not at all clear, he believes that the semaphore is "eventually" granted. But even if this were so, it is not done pursuant to the "in response to" limitations in the claims.

Therefore, the rejection should be reversed.

Respectfully submitted,

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Timothy N. Trop, Reg. No. 28,994
TROP, PRUNER & HU, P.C.
1616 South Voss Road, Suite 750
Houston, TX 77057-2631
713/468-8880 [Phone]
713/468-8883 [Fax]

Attorneys for Intel Corporation